

## **Exhibit A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

-----X

ADRIANA JURCEV,

Plaintiff,

**SUMMONS WITH NOTICE**

-against-

Index No. \_\_\_\_\_

CITIBANK, N.A.

Plaintiff resides at 75 Old Neck Road,

Defendant

Center Moriches, New York

\_\_\_\_\_X

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service , (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York);

PLEASE TAKE NOTICE THAT in case of your failure to appear or answer judgment will be taken against you by default for the relief demanded : a money judgment in sum of \$250,000.00.

The basis of the venue designated is that the Plaintiff resides in the county of Suffolk and the defendant both transacts business in and maintains offices for the transaction of business in the County of Suffolk.

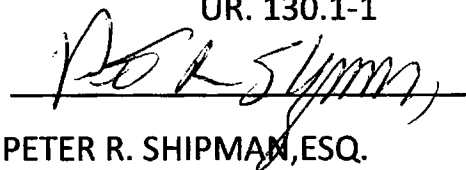
The basis of the claim against the defendant is amongst other grounds, breach of express contract, breach of the implied covenant of good faith and fair dealing, negligence, gross negligence and violation of the Uniform Commercial Code.

DATED: Smithtown, New York

YOURS ETC.

May 24, 2022

UR. 130.1-1

A handwritten signature in black ink, appearing to read "P. R. Shipman", is written over a horizontal line.

PETER R. SHIPMAN, ESQ.

Attorney for Plaintiff

42 Fulton Avenue

Smithtown, New York 11787

516 427 8103

COUNTY OF SUFFOLK

-----X  
ADRIANA JURCEV,

Plaintiff,

-against-

**SUPPLEMENTAL SUMMONS WITH  
NOTICE**

CITIBANK, N.A., BANK OF  
THAILAND, LTD.,  
BANGKOK BANK PUBLIC  
COMPANY, LIMITED, P.C.SOL  
-UTIONS, INC. and  
MCAFEE, INC.

Defendants

Index No. 609825-22

Plaintiff resides at 75 Old Neck Road,  
Center Moriches, New York

-----X  
TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney within 20 days after the service of this summons, exclusive of the day of service, (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York);

PLEASE TAKE NOTICE THAT in case of your failure to appear or answer judgment will be taken against you by default for the relief demanded: a money judgment in sum of \$250,000.00.

The basis of the venue designated is that the Plaintiff resides in the county of Suffolk and the defendants both transact business in and maintain offices for the transaction of business in the County of Suffolk.

The nature of and basis of the claim against the defendants is ,amongst other grounds, breach of express contract, breach of the implied covenant of good faith and fair dealing, negligence, gross negligence and violation of the Uniform Commercial Code.

DATED: May 26,2022

YOURS ETC.,

s/ PRS

PETER SHIPMAN,ESQ

U.R.130.1-1

Attorney for Plaintiff

42 Fulton Avenue

Smithtown,N.Y.11787

516 427 8103

TO:

:CITIBANK,N.A.

5 Court Square

Long Island City

N.Y.,N.Y11101

BANK OF THAILAND

1270 Avenue of the

Americas

N.Y.,N.Y 10020

BANGKOK BANK

PUBLIC COMPANY

LIMITED,

29 Broadway 19<sup>th</sup> fl

N.Y.,N.Y. 10006

P.C.SOLUTIONS,INC.

522 Fifth Avenue

N.Y.,N.Y. 10036

MCAFEE, INC.

607 THIRD AVE

N.Y.,N.Y.10158

STATE OF NEW YORK

COUNTY OF SUFFOLK

-----X

ADRIANA JURCEV,

Plaintiff,

AFFIRMATION OF SERVICE

-against-

Index No. 609825/2022

CITIBANK,N.A. ET. AL.

Defendants

\_\_\_\_\_X

PETER R. SHIPMAN, ESQ. an attorney at law, duly authorized to practice in New York, affirms under penalty of perjury that:

Your affirmant did serve the above named defendant, CITIBANK, N.A., by delivery of a true copy of the Summons in this action with a Notice of Electronic Filing to its representative located at 2 Court Square Long Island City New York, and another copy of both process shortly thereafter at 5 Court Square, Long Island City, New York on May 26,2022 at approximately 1pm.,at the CITIBANK buildings.

The above mentioned Citibank.NA.representative , Ms. RAFIA RAFAT is described as 5 feet tall, dark skinned, female, aged 20-25, with black hair, black eyes and a gold ring through the left side of her nose and had a heavy Indian or Pakistani accent, and stood behind a large counter with the large CITIBANK name and logo behind her.

Ms. RAFAT reached below her countertop and placed several **intake logs sheet for the receipt of documents** on her counter top which intake log sheets bore entry line blanks in columns indicating places to enter various intake of documents data, and then requested and then entered your affirmant's name

and other data on one of the informational lines on one log sheet and physically took the Summons and Notice of Electronic Filing in her hand. Ms. RAFAT stated that she would see to it that the Summons and the Notice of Electronic Filing reached the law department of CITIBANK, her employer.. She also stated that she had a custom and habit of receiving process on behalf of CITIBANK and then forwarding it to the law department. Several of the log sheets on the countertop already had names and dates of receipt of documents filled in in pen.

On May 31,2022 your affirmant at 3:12 pm. received an email from the Office of General Counsel of CITIBANK,NA. located in Wilmington Delaware, by one Assistant General Counsel, JOHN C. ARMSTRONG, ESQ, in addition to a prior telephonic conference in which he announced that he was aware of this lawsuit and that he was representing CITIBANK, NA.

DATED; SMITHTOWN, NEW YORK

June 6,2022

A handwritten signature in black ink, appearing to read "Peter R. Shipman", written over a horizontal line.

PETER R. SHIPMAN,ESQ.